



HARTSTEIN LAW OFFICES
Commerce Center, Suite 320
1800 Chapel Avenue West
Cherry Hill, New Jersey 08002

(856) 910-8900
(856) 910-8910 (Fax)
www.DanHartsteinLaw.com
danhartstein@verizon.net
Admitted In NJ & PA

December 2, 2019

Via E-Filing

The Honorable Ann Marie Donio, U.S.M.J.
Mitchell H. Cohen Courthouse
4th & Cooper St., Room 2040
Camden, NJ 08101

**RE: MARA SMITH v. PRISON TRANSPORT SERVICES OF AMERICA,
INC., et al.
Civil Action No.: 1:17-cv-13862-RBK-AMD**

Dear Judge Donio:

I represent the plaintiff, Mara Smith, in the above-referenced matter. Your Honor scheduled a Status Conference for December 9, 2019, based upon the sentencing in the criminal case involving defendant, Jermaine Taylor, occurring on November 1, 2019.

I am advising the Court that I have been advised by the Prosecutor's office that the Prosecutor's file will not be available for subpoena until at least forty-five days after the close of the criminal case, which would be mid-December. Further, I expect that once subpoenaed, my office will not receive a response until after the new year. It is expected that the information contained in the Prosecutor's file will greatly affect the type of discovery required in this matter and the timeline for such discovery, which is expected to occur in various regions of the country.

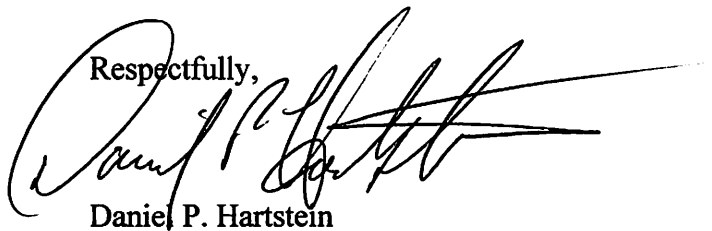
In light of this information and the continued Stay in this civil case, it may make sense to adjourn the December 9, 2019 Status Conference until after receipt of the Prosecutor's file. I am submitting this letter with consent of defendants' counsel, Linton W. Turner, Jr., Esquire.

**Pennsylvania Office:
1500 Walnut St., Suite 1920, Philadelphia, PA 19102
(215) 732-0306
(215) 732-2901 (Fax)**

The Honorable Ann Marie Donio, U.S.M.J.
December 2, 2019
Page -2-

Of course, we will proceed however Your Honor wishes.

Your attention and consideration are greatly appreciated.

Respectfully,

Daniel P. Hartstein

DPH:em

cc: Linton W. Turner, Jr., Esquire